

# EXHIBIT H.1

## Message

**From:** Jones, Larhonda R [/o=UHG-ExchangeMail/ou=First Administrative Group/cn=Recipients/cn=ljone65]  
**on behalf of** Jones, Larhonda R  
**Sent:** 9/3/2011 10:35:05 AM  
**To:** Ahmed, Malik I [/o=UHG-ExchangeMail/ou=First Administrative Group/cn=Recipients/cn=mahme20]  
**Subject:** RE: IMPORTANT CLARIFICATION

*Thank you. This is the type of info I need. I will review with clinical Directors and RVP.*



LaRhonda R. Jones, MD  
 Regional Medical Director  
 St Louis CAC  
 314-592-3612  
 larhonda.jones@optum.com

**From:** Ahmed, Malik I  
**Sent:** Friday, September 02, 2011 4:49 PM  
**To:** Jones, Larhonda R  
**Subject:** RE: IMPORTANT CLARIFICATION

I want you to check on 2 P2P which were sent today when you are in office.. It is so frustrating that we are short staff, no outside help and keep on getting inappropriate P2P. Actually there were three but one on [Redacted: PHI/PPH] I changed to consult. First pt is [Redacted: PHI/PPH] ID is [Redacted: PH/PPH] second one is [Redacted: PHI/PPH] ID no is [Redacted: PHI/PPH] thanks

**From:** Jones, Larhonda R  
**Sent:** Friday, September 02, 2011 10:41 AM  
**To:** Viamontes, George I; Ahmed, Malik I; Beach, Ronald L; Good, J L; Jones, Larhonda R; Salaris, Sheryl L  
**Subject:** FW: IMPORTANT CLARIFICATION  
**Importance:** High

*As discussed individually with all of you. Here is the formal directive and explanation. Please implement now. Do not include this language in any of your notes or rationales, Dr Beach is pulling it from the templated rationales in our system. Dr Good as you have been on vacation and I haven't had a chance to speak with you personally, if you have any questions just call.*

*Thanks.*



*LaRhonda R. Jones, MD*  
*Regional Medical Director*  
*St Louis CAC*  
*314-592-3612*  
*larhonda.jones@optum.com*

**From:** Triana, Lorenzo

**Sent:** Thursday, September 01, 2011 6:21 PM

**To:** Bonfield, William C; Haberman, Michael A; Meyerhoff, Jeffrey D; Robinson Beale, Rhonda J; Rosenzweig, Martin H; Sigler, Liviu; Smith, Timothy K; Zucker, Murray; Bailey, Michael J; Hamlin, Thomas A; Slayton, James M; Jones, Larhonda R; Triana, Lorenzo; Slayton, James M; Jimenez, Richard G; Martorana, Andrew

**Cc:** Bresolin, Michael J; Sekac, Maria R; Easterday, Adam R; Christopher, Terence C; Ewing, Faye; Janik, Lori S; Kluender, Tim R; Brody, Mark; Hahn, Cindy L; Malek, David J; Bridge, Frances R; Innecken, Eileen D

**Subject:** IMPORTANT CLARIFICATION

**Importance:** High

**Redacted: A/C Privileged**

**Redacted: A/C Privileged**

CONFIDENTIAL

UBHWIT0058306  
UBHWIT0058303-4

**SLIP SHEET**

**INTENTIONALLY BLANK**

Message

**From:** Slayton, James M [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=SLAYTON\_JM]  
**Sent:** 9/1/2011 8:26:40 PM  
**To:** Gallagher, Matthew J [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=12EEC5BF-6AF907EE-85256F1C-3CF7C1]  
**CC:** Rosenzweig, Martin H [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=5D81B481-A57ABB0B-852568E4-554836]  
**Subject:** FW: IMPORTANT CLARIFICATION  
**Importance:** High

This is an important clarification of our internal UBH policy in light of FMHP guidelines

My understanding is that PHL CAC is already "aligned" with this message.

didn't know if Martin wanted this as part of the Wednesday MD/directors meeting.

JS

**From:** Triana, Lorenzo  
**Sent:** Thursday, September 01, 2011 7:21 PM  
**To:** Bonfield, William C; Haberman, Michael A; Meyerhoff, Jeffrey D; Robinson Beale, Rhonda J; Rosenzweig, Martin H; Sigler, Liviu; Smith, Timothy K; Zucker, Murray; Bailey, Michael J; Hamlin, Thomas A; Slayton, James M; Jones, Larhonda R; Triana, Lorenzo; Slayton, James M; Jimenez, Richard G; Martorana, Andrew  
**Cc:** Bresolin, Michael J; Sekac, Maria R; Easterday, Adam R; Christopher, Terence C; Ewing, Faye; Janik, Lori S; Kluender, Tim R; Brody, Mark; Hahn, Cindy L; Malek, David J; Bridge, Frances R; Innecken, Eileen D  
**Subject:** IMPORTANT CLARIFICATION  
**Importance:** High

**Redacted: A/C Privileged**

**Redacted: A/C Privileged**



**Redacted: A/C Privileged**

**SLIP SHEET**

**INTENTIONALLY BLANK**

Message

**From:** Bresolin, Michael J [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=429A7164-2BC0BBB0-852566BA-518D0A]  
**Sent:** 9/2/2011 10:28:43 AM  
**To:** Triana, Lorenzo [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=TRIANA\_LO]  
**Subject:** RE: IMPORTANT CLARIFICATION

absolutely, you are a great partner! have a wonderful and relaxing holiday w/e!! mike

**From:** Triana, Lorenzo  
**Sent:** Friday, September 02, 2011 10:26 AM  
**To:** Bresolin, Michael J  
**Subject:** RE: IMPORTANT CLARIFICATION

Thank you Mike for touching it up and vetting it with Adam et al.

I also appreciate being able to have good, collegial, challenging conversations with you over these "touchy" subjects!

---

**From:** Bresolin, Michael J  
**Sent:** Thursday, September 01, 2011 10:38 PM  
**To:** Triana, Lorenzo  
**Subject:** RE: IMPORTANT CLARIFICATION  
excellent job, looks great too! thanks! mike

**From:** Triana, Lorenzo  
**Sent:** Thursday, September 01, 2011 6:21 PM  
**To:** Bonfield, William C; Haberman, Michael A; Meyerhoff, Jeffrey D; Robinson Beale, Rhonda J; Rosenzweig, Martin H; Sigler, Liviu; Smith, Timothy K; Zucker, Murray; Bailey, Michael J; Hamlin, Thomas A; Slayton, James M; Jones, Larhonda R; Triana, Lorenzo; Slayton, James M; Jimenez, Richard G; Martorana, Andrew  
**Cc:** Bresolin, Michael J; Sekac, Maria R; Easterday, Adam R; Christopher, Terence C; Ewing, Faye; Janik, Lori S; Kluender, Tim R; Brody, Mark; Hahn, Cindy L; Malek, David J; Bridge, Frances R; Innecken, Eileen D  
**Subject:** IMPORTANT CLARIFICATION  
**Importance:** High

**Redacted: A/C Privileged**

**Redacted: A/C Privileged**

**Redacted: A/C Privileged**

**SLIP SHEET**

**INTENTIONALLY BLANK**

## Message

**From:** Dodd, Jann E [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=D6434CE7-50A39FAB-85256C92-6B52D8]  
**Sent:** 9/29/2011 1:45:17 PM  
**To:** Brennecke, Margaret K [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=65FF5B06-FFBC78F5-852568D4-52EF5E]  
**CC:** Triana, Lorenzo [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=TRIANA\_LO]; Bobbitt, Bruce L [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=8FDFBF9F-3AEBA5C7-8525678C-4176C4]; Beardsley, Scott D [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=92609CB1-CAE00245-85256DC5-6295E1]; Janik, Lori S [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=7745DA7F-22A01F0-85256E98-3DEB62]  
**Subject:** FW: Your Support of CAC Clinical Operations is Requested

Hi Margie,

I want to make sure the ALERT staff is aware of this issue based on feedback I have gotten about denials being issued based on frequency of visits. I do not have specific examples, but Lori reviews letters and has identified this issue should be forwarded to you for consideration.

Jann

---

**From:** Dodd, Jann E  
**Sent:** Friday, September 23, 2011 11:52 AM  
**To:** Ewing, Faye; Christopher, Terence C; Janik, Lori S; Hayden, Lois C; Kluender, Tim R; Brody, Mark; Hahn, Cindy L; Innecken, Eileen D; Bridge, Frances R; Malek, David J  
**Cc:** Triana, Lorenzo; Keytel, Keith W; Sekac, Maria R; Bobbitt, Bruce L; Losey-Jankowski, Charla J; Powell, Michael C; Dahl, Kevin J; Tulskey, Kim R; Moore, Lisa  
**Subject:** Your Support of CAC Clinical Operations is Requested  
Hello.

I attended a meeting today about an important issue that impacts the CAC clinical operations. I want to ensure that all of you are aware of the issue, so I am providing this high level overview and will follow up with a discussion in the next OptumHealth Behavioral Solutions Compliance meeting.

The issue involves our policy that non-coverage benefit determinations are not to be based on "fail first" or "step therapy" requirements. CAC clinical operations are to avoid all statements that imply, or could be construed as implying that non-coverage determinations may be based on "fail first" or "step therapy" requirement. We think that you have an opportunity to support them in this. Dr. Triana is taking the lead in clarifying this matter with the Medical and Clinical staff. Please review the memo below that was distributed on September 1, 2011.

You can support the CAC clinical operations because you have a view into the non-coverage determination process before documentation is sent out. We need your assistance in reviewing and providing feedback to CAC clinical operations. The focus is on the language used in the rationale in a determination letter, the substance of the determination and the decision making process. The CAC operational compliance and appeals teams meet regularly with CAC clinical operations regarding the required timeframes for determinations, compliance rates and rationales used in the letters - we think this topic can be added to your on-going meetings. I notified staff today we are in the process of standardizing the assessment process/tool used to review determination/appeal letters before they are sent to the

members and providers. We will include this issue in the tool to assist you in identifying it and providing formal feedback to the CAC clinical operations.

The Quality Improvement Department is taking the lead in addressing the fail first/step therapy issue. They will be rolling out a more formal assessment plan in the next few weeks.

Please let me know if you have any questions/issues. Jann

## MEMORANDUM

To: Medical Directors and Clinical Staff  
From: Lorenzo Triana, M.D., SVP of Medical Management  
Date: September 1, 2011  
Subject: **Avoiding All Statements Implying Adverse Benefit Determinations May Be Based on "Fail First" or "Step Therapy" Requirements**

# Redacted: A/C Privilege



**Redacted: A/C Privilege**

**SLIP SHEET**

**INTENTIONALLY BLANK**

Message

**From:** Davis, James E [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=27E6D178-ED33A305-8525700C-536580]  
**Sent:** 9/9/2011 11:18:19 AM  
**To:** Haberman, Michael A [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=C91DEF8-BFCD793F-85256CFB-55EAAB]; Maples, Donna K [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=AEBCE44C-A9831F8F-852566C6-648C61]; Hunter, Knoxice C [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=36E08E8C-6D22B5CF-852567A7-3E8E6A]; Zick, Paul J [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=7BE98FA9-3CD34605-852567B4-65C94F]  
**CC:** Shortridge, Julie A [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=430F93E0-CF4ACD57-852567A9-3FCA9E]  
**Subject:** RE: IMPORTANT CLARIFICATION

The memo has been forwarded. There needs to be a face to face review. Julie will include in upcoming staff training. Important for managers to carry the word, as well.

James E. Davis  
VP, Clinical Operations

OptumHealth  
4170 Ashford Dunwoody Rd, Ste 100  
Atlanta, Georgia 30319, U.S.A.

T +1 404-842-7415  
M +1 678-896-3313

[james.davis@optum.com](mailto:james.davis@optum.com)  
[www.optum.com](http://www.optum.com)

OptumHealth is part of Optum—a leading health services business.

---

**From:** Haberman, Michael A  
**Sent:** Friday, September 09, 2011 10:39 AM  
**To:** Maples, Donna K; Hunter, Knoxice C; Davis, James E  
**Subject:** FW: IMPORTANT CLARIFICATION

Larry raises the issue of CA training with respect to Lorenzo's memo re: **Avoiding All Statements Implying Adverse Benefit Determinations May Be Based on "Fail First" or "Step Therapy" Requirements**

Michael A. Haberman, MD, MBA  
Regional Medical Director, Atlanta CAC  
OptumHealth  
4170 Ashford Dunwoody Rd, Ste 100  
Atlanta, Georgia 30319, U.S.A.

T +1 404-846-7556

M +1 404-964-7035

michael.haberman@optum.com

www.optum.com

OptumHealth is part of Optum – a leading health services business.

---

**From:** Baker, Lawrence D

**Sent:** Friday, September 09, 2011 10:21 AM

**To:** Haberman, Michael A

**Subject:** RE: IMPORTANT CLARIFICATION

Have the care advocates been trained on the details of this memo?

---

**From:** Haberman, Michael A

**Sent:** Friday, September 02, 2011 8:36 AM

**To:** Baker, Lawrence D; Bradford, Andrea; Goldart, Jed C; Hammond, Tara B; Kaufman, Jerome E; Maass-Robinson, Sandra A; Soto, Michael L

**Cc:** Davis, James E; Maples, Donna K; Hunter, Knoxice C; Daniel, Marilyn S; Geraci, Gerri M

**Subject:** FW: IMPORTANT CLARIFICATION

**Importance:** High

All

Please carefully review the memorandum below which impacts us directly in our daily operations.

**Michael A. Haberman, MD, MBA**

Regional Medical Director, Atlanta CAC

OptumHealth

4170 Ashford Dunwoody Rd, Ste 100

Atlanta, Georgia 30319, U.S.A.

T +1 404-846-7556

M +1 404-964-7035

michael.haberman@optum.com

www.optum.com

OptumHealth is part of Optum – a leading health services business.

---

**From:** Triana, Lorenzo

**Sent:** Thursday, September 01, 2011 7:21 PM

**To:** Bonfield, William C; Haberman, Michael A; Meyerhoff, Jeffrey D; Robinson Beale, Rhonda J; Rosenzweig, Martin H; Sigler, Liviu; Smith, Timothy K; Zucker, Murray; Bailey, Michael J; Hamlin, Thomas A; Slayton, James M; Jones, Larhonda R; Triana, Lorenzo; Slayton, James M; Jimenez, Richard G; Martorana, Andrew

**Cc:** Bresolin, Michael J; Sekac, Maria R; Easterday, Adam R; Christopher, Terence C; Ewing, Faye; Janik, Lori S; Kluender, Tim R; Brody, Mark; Hahn, Cindy L; Malek, David J; Bridge, Frances R; Innecken, Eileen D

**Subject:** IMPORTANT CLARIFICATION

**Importance:** High



**M E M O R A N D U M**

**To:** Medical Directors and Clinical Staff  
**From:** Lorenzo Triana, M.D., SVP of Medical Management  
**Date:** September 1, 2011  
**Subject:** **Avoiding All Statements Implying Adverse Benefit  
Determinations May Be Based on "Fail First" or "Step  
Therapy" Requirements**

**Redacted: A/C Privilege**

**Redacted: A/C Privilege**

**SLIP SHEET**

**INTENTIONALLY BLANK**

## Message

**From:** Rosenzweig, Martin H [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=5D81B481-A57ABB0B-852568E4-554836]  
**Sent:** 4/5/2013 8:46:31 AM  
**To:** Satten, Neal R [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=96459C9A-D693ACC8-85256F03-573635]; Goldberg, Lawrence [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=6323F721-2F27BA29-85256F79-6404C8]; Privette, Melinda H [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=FE1C58AA-ED697049-8625725D-7795E0]; Maas, Margaret E [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=FB5A7C4C-87BEA36D-85256962-5BE6C1]; Feussner, James W [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=9FBC1E48-1228E65-852569B3-554D1A]; James, Frank P [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=FJAMES1]; Dicasimirro, Bernard J [/O=UHG-EXCHANGEMAIL/OU=FIRST ADMINISTRATIVE GROUP/CN=RECIPIENTS/CN=BDICASI]  
**Subject:** FW: IMPORTANT REMINDERS  
**Attachments:** Reviewer Attestation Job Aide 12 17 12.pdf  
**Importance:** High

Please can you read Lorenzos email below and send me e-mail confirming you have reviewed

Martin Rosenzweig, MD

Regional Medical Director

(OptumHealth Behavioral Solutions)

100 Penn Square East Suite 400 Philadelphia PA 19107  
 W 215 557-6015 C 215-850-1585 F 267-216-3114

**From:** Triana, Lorenzo  
**Sent:** Thursday, April 04, 2013 8:44 PM  
**To:** Haberman, Michael A; Hamlin, Thomas A; Grabowitz, Ellen; Jones, Larhonda R; Martorana, Andrew; Rosenzweig, Martin H; Sanders, Roxane Y; Soto, Michael L; Smith, Timothy K; Zucker, Murray  
**Cc:** Bonfield, William C; Robinson Beale, Rhonda J; Bobbitt, Bruce L; Beardsley, Scott D; Dodd, Jann E; Beaty, Jon D  
**Subject:** IMPORTANT REMINDERS  
**Importance:** High

Good evening to all,

I would like for you to remind your medical staff of the importance of adhering to the following two guidelines below:

1) All medical directors MUST use only current template language when writing their rationales for benefit determinations. It is important that no *Fail first* or *Step Therapy* statements be made, as noted in my memo below. Some medical directors may still be using old templates that are outdated and must be replaced!



2) All medical directors must include the *Reviewer Attestation*, as per URAC requirements, when completing Appeal Determinations as noted in the attached Job Aide.

Please send me a confirmation email once you have discussed these requirements with your medical staff and let me know if there are any questions.

Thanks for your prompt attention to this important matter.

***Lorenzo Triana, MD***

Senior Vice President of Medical Operations  
OptumHealth Behavioral Solutions



#### MEMORANDUM

To: Medical Directors and Clinical Staff  
From: Lorenzo Triana, M.D., SVP of Medical Management  
Date: September 1, 2011  
Subject: **Avoiding All Statements Implying Adverse Benefit Determinations May Be Based on "Fail First" or "Step Therapy" Requirements**

**Redacted: A/C Privilege**

**Redacted: A/C Privilege**